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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LATESHA WATSON,

Plaintiff,

v.

CITY OF HENDERSON; BRISTOL
ELLINGTON; KEVIN ABERNATHY;
KENNETH KERBY; RICHARD DERRICK;
RICHARD MCCANN; NICK VASKOV;
KRISTINA GILMORE; DOES I through X,
inclusive,

Defendants.

Case No.: 2:20-cv-01761-APG-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
FILE REPLY IN SUPPORT OF MOTION
FOR RECONSIDERATION
(FIRST REQUEST)**

[ECF 84, 92]

Plaintiff, LaTasha Watson (“Watson”) by and through counsel of record, Marc P. Cook, Esq. of the law firm of COOK & KELESIS, LTD.; Defendants, Kevin Abernathy, Richard McCann and Kenneth Kerby, by and through counsel of record, Nicholas M. Wiczorek, Esq. of the law firm of CLARK HILL PLLC; and Defendants City of Henderson, Richard Derrick, Bristol Ellington, Nicholas Vaskov and Kristina Escamilla Gilmore, by and through counsel of record, Patrick G. Byrne, Esq. of the law firm of SNELL & WILMER LLP, hereby stipulate to extend the deadline for Plaintiff to file her reply in support of her Motion for Reconsideration [ECF 92] of this Court’s

September 23, 2021 Order (1) Granting in Part Motions to Dismiss, (2) Granting in Part Motion for Leave to Amend, (3) Denying as Moot Anti-SLAPP Special Motion to Dismiss, and (4) Denying as Moot Motion for Leave for Discovery [ECF 84].

This request is requested and warranted for the following reasons:

1. Plaintiff filed her Motion for Reconsideration on November 1, 2021;
2. Plaintiff stipulated and this court granted an extension for Defendants' to file their responses to Plaintiff's motion until December 3, 2021;
3. Plaintiff's reply in support of her motion is currently due December 20, 2021;
4. Plaintiff's counsel requires additional time to prepare replies that appropriately analyze and address the issues in each of the two (2) responses to the Motion that have been filed on behalf of the 11 uniquely situated Defendants;
4. Counsel's family's pre-arranged plans for the upcoming holidays is also a factor necessitating an extension of time.
5. Accordingly the parties stipulate that Plaintiff may have a three (3) week extension from December 20th to file her reply, or until Monday, January 10, 2022.
5. The extensions is sought in good faith and not for the purpose of delay.

DATED this 10th day of December, 2021.

DATED this 10th day of December, 2021.

COOK & KELESIS, LTD.

CLARK HILL PLLC

By: Marc P. Cook /s

By: Nicholas M. Wieczorek /s

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3800 Howard Hughes Parkway, Suite 500
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*Attorney for Defendants Kevin Abernathy,
Richard McCann and Kenneth Kerby*

1 DATED this 13th day of December.

2 By: *Richard C. Gordon /s*

3 PATRICK G. BYRNE, ESQ.

Nevada Bar No. 007636

4 RICHARD C. GORDON, ESQ.

Nevada Bar No. 009036

5 3883 Howard Hughes Parkway, Suite 1100

Las Vegas, Nevada 89169


6 *Defendants City of Henderson, Richard*

Derrick, Bristol Ellington, Nicholas

7 *Vaskov and Kristina Escamilla Gilmore*

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9 **ORDER**

10 IT IS SO ORDERED.

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14 ANDREW P. GORDON
15 UNITED STATES DISTRICT JUDGE
16 DATED: December 14, 2021
17 Case No.: 2:20-cv-01761-APG-BNW
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